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U.S. EPA (P-19J)
77 West Jackson Boulevard
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December 7, 1998

Re: Evergreen Manor TCE Site, Winnebago County, IL
Comments on Engineering Evaluation/Cost Analysis

Dear Ms. Pope:

This letter and the enclosures provides Ecolab Inc.'s (Ecolab) comments on the Engineering Evaluation/Cost Analysis (EE/CA) prepared by U.S. Environmental Protection Agency relating to the proposed Evergreen Manor TCE Site in Winnebago County, Illinois. Ecolab incorporates into this submittal package Ecolab's October 9, 1998 comments to U.S. EPA on the preliminary proposal to list the proposed Site on the National Priorities List (NPL). As discussed in the enclosed comment materials, Ecolab denies liability with respect to the proposed Site. Without repeating each of its prior comments at length, Ecolab highlights several points.

First, the EE/CA should focus on trichloroethylene (TCE) as the primary contaminant of concern at the proposed Site. In other words, any removal action should focus on addressing potential concerns associated with TCE.

As stated on page 2 of the EE/CA, concentrations of TCE have ranged from a high of 75 parts per billion (ppb) in 1990 to a high of 22 ppb in 1996. By contrast, concentrations of perchloroethylene (PCE) have been much lower. The Maximum Contaminant Levels (MCL) for public water supply systems as promulgated by U.S. EPA under the federal Safe Drinking Water Act for both parameters is 5 ppb. In fact, U.S. EPA's MCL regulations at 40 C.F.R. 141.32(e)(48) state: "Drinking water that meets this standard is associated with little to none of this risk and is considered safe with respect to PCE." Given that PCE has been found just slightly above the MCL in only 4 samples out of 512 samples from the residential wells, any U.S. EPA removal action related to PCE would be unnecessary. U.S. EPA's removal action or remedial action, if any, should focus on TCE.

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Second, the proposed Site definition used in the EE/CA should be limited to the Evergreen Manor residential areas in Section 29, Township 46 North, Range 2 East where TCE has been detected above MCLs or above Observable Release Criteria. In particular, the proposed Site should not include Ecolab's property approximately 1-2 miles northeast of Section 29. TCE has never been detected in the soil or soil gas samples on Ecolab's property. Likewise, in numerous groundwater sampling events by Illinois EPA during 1995-1996, TCE was never detected in groundwater under Ecolab's property. Accordingly, the proposed Site definition should focus on the Evergreen Manor residential subdivisions in Section 29 and should not extend to unrelated areas miles away.

Third, the proposed Site should not be listed on the NPL for the reasons given in the enclosed comments dated October 9, 1998. The EE/CA suggests that U.S. EPA may perform a Remedial Investigation/Feasibility Study (RI/FS) at a later date, presumably, if the proposed Site is listed on the NPL. TCE and other volatile organic compound (VOC) concentrations have declined more than 75% since 1991. Thus, natural attenuation is addressing any potential environmental concerns that otherwise would be investigated in an RI/FS. Indeed, the Illinois EPA's letter dated October 2, 1998 (EE/CA Appendix C) suggests that concentration levels may be below MCLs within three years. Because the EE/CA concludes that any of the removal actions proposed in the EE/CA would effectively mitigate the risks to public health, there is no reason to list the site on the NPL or to expend resources on an RI/FS. Stated differently, an RI/FS is both duplicative and unnecessary in light of this EE/CA.

Finally, Ecolab specifically requests that the Agency include these comments and the enclosures in the administrative record. Ecolab is not an owner, operator, or person who arranged for the disposal of hazardous substances that resulted in a release or threatened release of TCE within the meaning of Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act. Ecolab fully reserves its rights to supplement these comments.

Sincerely,



Steven M. Christenson

Cc: Michael W. Ribordy, U.S. EPA (SR-6J)
Janice S. Loughlin, U.S. EPA (C-29A)
F.S. Mueller, Johnson & Bell
B.C. Clegg, Conestoga-Rovers & Assoc.

Enclosures:

1. Ecolab Submittal Package (Jan. 31, 1997)
2. Ecolab Submittal Package (Sept. 22, 1997)
3. Ecolab Submittal Package (Oct. 9, 1998)